

18 CV 12064

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKCESTUI QUE STEVEN TALBERT WILLIAMS(SON OF MRS. LINDA PAULA STREFFER WILLIAMS; SON OF WILLIS EUGENE WILLIAMS, JR.) CV \_\_\_\_\_  
Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-  
UNITED STATES, et al.

## COMPLAINT

(U.S. Dept. of Treasury (IRS; SSA (Off. of Gen. Counsel; NYS SSA; NY County SSA); Illinois Dept. of Rev.; NYS Dept. of Taxation; NYC Dept. of Finance; NJ Dept. of Banking &amp; Insur.) U.S. Dept. of Justice (D.A. Off. of the County of NY; S.D. N.Y.); U.S. Dept. of Labor; U.S. Dept. of Health &amp; Human Serv.; U.S. Dept. of Trans.; U.S. Postal Service; Avram P. Vann, P.C.; Pershing, LLC; VBS AG; FMR, LLC; BNY Mellon Corp.; Bank of Amer. NA; NY Dept. of State; NY Sup. Ct., Kings Co., Civ.;

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

See Attached  
"COMPLAINT: STATEMENT OF  
NAMED PARTIES"Maryland Admin. Office of the Courts;  
Borah, Goldstein, Altschuler, Nahins & Goidel P.C.;  
Walker & Dunlop Cap. LLC (CW Cap. Asset Mgmt.);  
Compass Rock RE, LLC; Fortress Investment Grp. LLC;  
Blackstone Adv. Partners, LP; Wells Fargo Bank, NA;  
PSW NYC, LLC; Tishman Speyer Crown Eqv. LLC;  
BlackRock, Inc.; Pershing Sq. Hldgs., Ltd.; State Farm  
Life Insur. Co.; NYS Dept. of Trans.; NYC MTA;  
NYC Transit Adjudication Bureau; NYPD; NYC  
Dept. of Homeless Serv.; White Plains Dept. of  
Public Safety; White Plains Hosp.; Amal. Life Insur. Co.;  
Burnes & Noble, Inc.; Breking Ground; Fitted Sole, LLC;  
Fitted Sole Clothing Co.;  
Google, Inc.;  
NY Times Co.;  
NY Times Fed.  
Credit Union;  
Rockefeller Cap.  
Int., Inc.  
and other  
named defendants

## NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ Federal Question
- ☒ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

U.S. Const. Art. I § 8 Cl. 17, 1 § 10, 3 § 3, 6 § 3; U.S. Const. Am. 1, 4, 5, 6, 7, 8, 10, 13 § 3, 14 § 1, 14 § 4, 16, 26 § 1; Habeas Corpus (28 USC § 2241); Clayton Act (1914); Sherman Antitrust Act (1980); Economic Espionage Act (1996); RICO; Dodd-Frank Act (2010); Rent Stabilization Act (1969); and other Acts of Congress. Seeks immediate leave to the App. Ct. for S.D.N.Y. named as defendant (Conflict of Interest), as well as for a ruling on prima facie evidence.

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Cestui Que Steven Talbert Williams, is a citizen of the State of  
(Plaintiff's name)

New York (due to Maryland Dist. Ct. Habeas Claims)  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, Md. Admin. Off. of the Courts, is incorporated under the laws of the State of Maryland

and has its principal place of business in the State of Maryland

or is incorporated under the laws of (foreign state) U.S.A. (18 USC §§ 516, 1349, 3002(15)(A))

and has its principal place of business in United States.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>CESTUQUE STEVEN</u>	<u>T. (TALBERT)</u>	<u>WILLIAMS</u>	<u>;</u>
First Name	Middle Initial	Last Name	
<u>N/A (CURRENTLY DISPLACED)</u>			
Street Address			
<u>NEW YORK</u>	<u>NY</u>	<u>N/A</u>	
County, City	State	Zip Code	
<u>N/A</u>	<u>STENLEGAL@GMAIL.COM</u>		
Telephone Number	Email Address (if available)		

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: United States of America (namely U.S. Dept. of Treas.; IRS; & SSA)  
 First Name Last Name  
U.S. Atty. Gen. (Mr. Matthew M. Whitaker, serving (28 USC §§ 503, 515(a))  
 Current Job Title (or other identifying information)  
U.S. Dept. of Justice 950 Pennsylvania Ave, NW  
 Current Work Address (or other address where defendant may be served)  
Washington, D.C. 20530-6001  
 County, City State Zip Code

Defendant 2: Sergio P. Ermetti  
 First Name Last Name  
CEO of UBS AG  
 Current Job Title (or other identifying information)  
1285 Ave. of Americas  
 Current Work Address (or other address where defendant may be served)  
NY NY 10019  
 County, City State Zip Code

Defendant 3: Gerald Hasser  
 First Name Last Name  
CEO of Bank of NY Mellon Corp.  
 Current Job Title (or other identifying information)  
One Wall Street  
 Current Work Address (or other address where defendant may be served)  
NY NY 10286  
 County, City State Zip Code

Defendant 4: Timothy J. Sloan  
 First Name Last Name  
CEO of Wells Fargo Bank, NA  
 Current Job Title (or other identifying information)  
101 North Phillips Ave.  
 Current Work Address (or other address where defendant may be served)  
Sioux Falls South Dakota 57104  
 County, City State Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: New York, New Jersey, Maryland & Washington DC

Date(s) of occurrence: Various dates, from May 8, 2012 (and prior) to Present.

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

- Primary action is brought against the United States due to claims surrounding an alleged co-conspired infiltration and influence ~~within~~ the IRS (to conceal tax documents and other information of Mrs. Linda Paula Stogger Williams' (Decedent's) Individual Retirement Acct. (IRA) trust (Pershing, LLC & VBS Acct. #; x 7439 - EIN #; x 8899 - Treas. (IRS) form SS-4 #; x 6766 and evidence of a W-4 form) and other claims), however, the agencies are enjoined for further claimed corruptive acts (including the SSA).
- SDNY is named a defendant creating a conflict of interest for jurisdiction and warranting not only the reopening of trial # 15-cv-5114 (LAP) (SDNY) but also immediate leave to the App. Ct. where the original complaint for 15-cv-5114 (LAP) (SDNY) may be evidenced as stating jurisdiction being enforced under 15 USC § 226.
- Claimed factual events and evidence (including new evidence of Pershing Sq. Hldg. Gp. LLC's Initial Public Offering, evidencing VBS AG and BNY (Pershing, LLC) reinvesting assets within the mortgaged trusts of Peter Cooper Village/Shirvessant Town (PCV/ST) (Apt. 7D of Building 449 E. 14th Street, including claims of:
  - (1) Decedent's legal representative, Mr. Aaron R. Vahn's, neglect to provide Plaintiff access to assets within an "irrevocable" testamentary "BENEFICIAL TRUST" (Trust LPSW) upon his custodial age of 30 yrs. old;
  - (2) FDIC's validation of assets within Trust LPSW;
  - (3) Tishman, BlackRock and CWCAP Asset Mgmt.'s (CWCAM's) eviction of Decedent (after her death), Plaintiff and Mr. Williams Jr. (Willis Eugene Williams Jr.) from PCV/ST where the owners allegedly performed financial background checks on a 11 tenants (obtaining knowledge of Decedent's assets and records) (see Matter of Ditzengoff) and a real property asset in Pennsylvania, where PCV/ST owners previously attempted to evict Decedent (as the original tenant) claiming the dwelling wasn't her primary residence;
  - (4) CWCAM's neglect to provide Plaintiff or Mr. Williams Jr. a renewal lease after the death of Decedent;
  - (5) CWCAM bringing an early action in N.Y.H.C. for eviction of Plaintiff (a rent stabilized tenant) (State Farm Renters Insur. #; x 7212-S; and
  - (6) a complex interwoven ~~also~~ networking of financial institutions connected to the ownership of PCV/ST (namely BlackRock (AIG), Tishman, Merrill, Wells, Gramerzy, BNY (Pershing), VBS, JP Morgan (JP Sec.), CWCAM (BCANG), PSH (PSW), Blackstone Gp., and other related corporations)

Such is further claimed to be an alleged co-conspired antitrust and racketeering mortgage scheme (through CMBs, CDOs, DIL auctions, dark pool investments and staged judicial proceedings; as such violated various constitutional and statutory provisions of law, namely U.S. Const. Am. 1, 4, 5, 8, 10, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 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1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1438, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 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1685, 1686, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1720, 1721, 1722, 1723, 1724, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1743, 1744, 1745, 1746, 1747, 1748, 1749, 1750, 1751, 1752, 1753, 1754, 1755, 1756, 1757, 1758, 1759, 1760, 1761, 1762, 1763, 1764, 1765, 1766, 1767, 1768, 1769, 1770, 1771, 1772, 1773, 1774, 1775, 1776, 1777, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1788, 1789, 1790, 1791, 1792, 1793, 1794, 1795, 1796, 1797, 1798, 1799, 1800, 1801, 1802, 1803, 1804, 1805, 1806, 1807, 1808, 1809, 1810, 1811, 1812, 1813, 1814, 1815, 1816, 1817, 1818, 1819, 1820, 1821, 1822, 1823, 1824, 1825, 1826, 1827, 1828, 1829, 1830, 1831, 1832, 1833, 1834, 1835, 1836, 1837, 1838, 1839, 1840, 1841, 1842, 1843, 1844, 1845, 1846, 1847, 1848, 1849, 1850, 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2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 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**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

12-20-2018  
 Dated \_\_\_\_\_  
 Plaintiff's Signature   
Cestis Que Steven T. (Talbert) Williams  
 First Name Middle Initial Last Name  
N/A (Currently Displaced)  
 Street Address  
New York NY N/A  
 County, City State Zip Code  
N/A STWLEGAL@GMAIL.COM  
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

---

(DOCKET NO.)

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**SOUTHERN DISTRICT COURT OF THE STATE OF NEW YORK**

---

**CESTUI QUE STEVEN TALBERT WILLIAMS**

*U.*

**UNITED STATES OF AMERICA, et al.**

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**COMPLAINT: STATEMENT OF NAMED PARTIES**

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*In association with:*

*“COMPLAINT,”*

*“APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS,”*

*&*

*“PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241”*

---

STEVEN TALBERT WILLIAMS

*CESTUI QUE, Pro Sé Litigant*

*Fitted Sole Productions, D.B.A. &*

*Fitted Fables, D.B.A.*

*(Previously addressed at:*

*449 E. 14<sup>th</sup> Street, Apt. 7d*

*New York, N.Y. 10009)*

*STWLEGAL@gmail.com*

**December 19, 2018**

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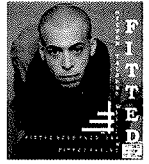
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 In re.: *Cestui Que Steven Talbert Williams v.*  
*United States, et al.* (Docket No. Unassigned)

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## DISCLAIMER

### HIGHLIGHTED NOTATIONS

The asterisk symbol “ \* ” is referenced as being disclaimer notations addressed to the court, appearing in a scaling format where “ \* ” symbolizes notation #1, “ \*\* ” symbolizes notation #2, and so on (separated with a “ / ” after every five, “ \*\*\*\*\* ”), yet starts anew with each individually titled document, similar to that of each “*FOOTNOTE*” (wherein each is presented as “*Red*”). The forgoing text of each notation and *FOOTNOTE* is represented in “*italics*” and single spaced in the minimum text size of 10 pts (in compliance with L.R. 11.1(b)).

- 
- \* *Normal text size for the body of all documents has been set to 11 pts. Such size has been changed from normal court document text size of 12 pts. due to **Plaintiff** being monetarily deprived, and attempting to save his performance union money in stationary materials.*
  - \*\* *A personalized numbered header is provided on all documented pages, excluding the title page. Each page is additionally numbered separately at the bottom, while introduction pages are numbered as Roman numerals. This format is presented as a necessary precaution in light of claims surrounding identity theft, internet intrusion and mail fraud.*
  - \*\*\* *References to appendices appear in “Purple.”*
  - \*\*\*\* *References to accompanying documents appear in “Blue.”*
  - \*\*\*\*\* *References to exhibits appear in “Brown.”*
  - \*\*\*\*\*/ \* *As is customary universal procedure of the **United States** court system, the plaintiff name appears in bold “Green,” while the defendant name appears in bold “Red.”*

*Complaint: Statement Of Named Parties  
Southern District Court of the State of New York*



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*In re.: Cestui Que Steven Talbert Williams v.  
United States, et al. (Docket No. Unassigned)*

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COMPLAINT: STATEMENT OF NAMED PARTIES .....	13 (P.1)
CONCLUSION .....	37 (P.23)

## JURISDICTION

Jurisdiction is invoked under:

L.R. 11.1; Fed. R. Civ. P. 3, 5(c); &

Fed. R. Crim. P. 3, 4.1

## STATUTES AND RULES/ CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Fed. R. Civ. P. 3 .....	3 (Par.iii)
Fed. R. Civ. P. 5(c) .....	3 (Par.iii)
Fed. R. Crim. P. 3 .....	3 (Par.iii)
Fed. R. Crim. P. 4.1 .....	3 (Par.iii)
L.R. 11.1 .....	3 (Par.iii), 4 (Par.1)

\*\*\*\*\*/ \*\* Pages are classified in header numerical order with designated Party ("Par.") pages.

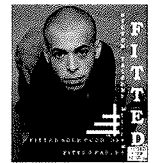
*Petition For Leave To Appeal To The Supreme Court Of The United States  
United States Court of Appeals for the Second Circuit*



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United States, et al., Docket No. 16-189cv(ALK)(DJ)(BDP)*

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SOUTHERN DISTRICT COURT OF THE  
STATE OF NEW YORK

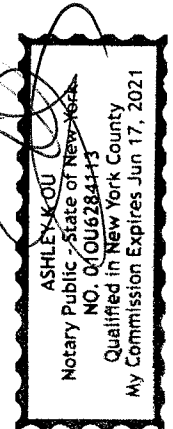
Steven Talbert Williams, PRO SÉ  
*CURRENTLY DISPLACED*  
~~P.O. Box 1760~~ New York, NY 10159

CESTUI QUE STEVEN TALBERT WILLIAMS  
(SON OF LINDA PAULA STREGER WILLIAMS;  
SON OF WILLIS EUGENE WILLIAMS)  
  
PLAINTIFF

v.

UNITED STATES OF AMERICA, et al  
  
DEFENDANT

COMPLAINT:  
STATEMENT OF  
NAMED PARTIES



Docket #: \_\_\_\_\_

Date: December 19, 2018

Pro Sé Clerk's Office: Thurgood Marshall U.S. Courthouse 40 Foley Sq., N.Y., N.Y. 10007

## COMPLAINT: STATEMENT OF NAMED PARTIES

I, Cestui Que Steven Talbert Williams ("Plaintiff," Pro Sé), present this deposing statement (under L.R. 11.1) to the *Southern District Court of the State of New York* ("S.D.N.Y.") as a supplemental filing to the COMPLAINT detailing a listing of named defendants; many of which are sought for enjoining as being associated to the overall matter of claimed racketeering, enterprise corruption, economic espionage and the alleged illegal eviction from Peter Cooper Village/Stuyvesant Town ("PCV/ST").

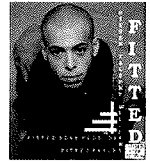
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## **PART A - PRIMARY DEFENDANTS**

### ***A.1 – Federal & Local Government.***

#### **NEW YORK COUNTY HOUSING COURT (“N.Y.H.C.”):**

- |    |                                      |                   |          |       |          |
|----|--------------------------------------|-------------------|----------|-------|----------|
| 1. | <b>Hon. Margaret A. Pui Yee Chan</b> | 80 Centre Street  | New York | NY    | 10013    |
|    | Name                                 | Address           | City     | State | Zip Code |
| 2. | <b>Hon. John H. Stanley</b>          | 111 Centre Street | New York | NY    | 10013    |
|    | Name                                 | Address           | City     | State | Zip Code |

#### **UNITED STATES DEPARTMENT OF TREASURY (“U.S. Treas.”): (OC over IRS, S.S.A., & other revenue agencies):**

- |    |                                   |                              |                |       |          |
|----|-----------------------------------|------------------------------|----------------|-------|----------|
| 3. | <b>Sec. Jacob J. Lew</b> (OC, ND) | 1500 Pennsylvania Avenue, NW | Washington, DC | 20220 |          |
|    | Name                              | Address                      | City           | State | Zip Code |

#### **United States Internal Revenue Service (“IRS”):**

- |    |   |  |                |       |          |
|----|---|--|----------------|-------|----------|
| 4. | <b>Comm. John Koskinen</b> (OC)                                   | Civ. Rights Div., 1111 Constitution Avenue, NW | Washington, DC | 20224 |          |
|    | Name  | Address  | City           | State | Zip Code |
| 5. | <b>John Doe (22)</b> (IRS Agent “David Moeser,” ID No. “0196323”) |  |                |       |          |
|    | Name  | Address  | City           | State | Zip Code |
| 6. | <b>John Doe (23)</b> (IRS Agent “Frank Barlo,” ID No. “0195670”)  |  |                |       |          |
|    | Name  | Address  | City           | State | Zip Code |

#### **Illinois Department of Revenue (“Ill.Rev.”):**

- |    |  |         |      |       |          |
|----|--|---------|------|-------|----------|
| 7. | <b>Dir. Connie Beard</b> (OC, ND)  |         |      |       |          |
|    | James R. Thompson Center - Concourse Level 100 West Randolph Street Chicago, Illinois 60601-3274 |         |      |       |          |
|    | Name   | Address | City | State | Zip Code |

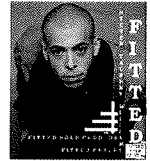
#### **New York State Department of Taxation & Revenue (“N.Y.S.D.T.F.”):**

- |    |  |                  |          |       |            |
|----|--|------------------|----------|-------|------------|
| 8. | <b>Sup. Maria T. Vullo</b> (OC, renamed) | One State Street | New York | NY    | 10004-1511 |
|    | Name                                     | Address          | City     | State | Zip Code   |

#### **New York City Department of Finance (“N.Y.C.D.F.”):**

- |     |   |                         |      |       |          |
|-----|---|-------------------------|------|-------|----------|
| 9.  | <b>Comm. Jacques Jiha, Ph.D.</b>  |                         |      |       |          |
|     | NYC Dept. of Finance Correspondence Unit One Centre Street, Fl. 22 New York, NY 10007 |                         |      |       |          |
|     | Name  | Address                 | City | State | Zip Code |
| 10. | <b>John Doe (15)</b> (N.Y.P.D.)   | (see Defendant No. 119) |      |       |          |
|     | Name  | Address                 | City | State | Zip Code |
| 11. | <b>John Doe (16)</b> (N.Y.P.D.)   | (see Defendant No. 119) |      |       |          |
|     | Name  | Address                 | City | State | Zip Code |

*Petition For Leave To Appeal To The Supreme Court Of The United States  
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**New Jersey Department of Banking & Insurance ("N.Y.D.B.I."):**

12. **Comm. Richard J. Badaloto (OC)** 20 West State Street, P.O. Box 325 Trenton, NJ 08625  
 Name Address City State Zip Code

**UNITED STATES SOCIAL SECURITY ADMINISTRATION ("S.S.A."):**

13. **Comm. Carolyn W. Colvin (OC)** S.S.A. 200 Constitution Avenue, NW Washington, DC 20210  
 Name Address City State Zip Code

**Social Security Administration Office of the General Counsel ("S.S.A.O.G.C."):**

14. **Andy Lui (Gen. Counsel, OC)** Altmeyer Bldg, Rm. 600, 6401 Security Boulevard, Baltimore, MD 21235  
 Name Address City State Zip Code

**New York State Social Security Administration ("N.Y.S.S.A."):**

15. **Comm. Fred M. Maurin (OC)** (Reg. Office) 26 Federal Plaza, Rm. 40-120 New York, NY 10278  
 Name Address City State Zip Code

**New York County Social Security Administration ("N.Y.C.S.S.A."):**

16. **Jane Doe (1) ("Ms. Parker," Supervisor, unverified)** 123 Williams Street New York, NY 10038  
 Name Address City State Zip Code

**A.2 – Owners of PCV/ST & Associated Mortgaged Trusts to Trust LPSW (2010 to Present).**

**BANK OF AMERICA, NATIONAL ASSOCIATES ("BOA," including BNY Mellon Asset Mgmt., BNY Mellon Wealth Mgmt., BNY Asset Mgmt. Fixed Income, Cash & Currency Group, Merrill Lynch Mortgage Lending, Inc & BlackRock, Inc.):**

17. **Brian Moynihan (C.E.O.) (OC)** Founders Hall, 100 N Tryon St #170, Charlotte, NC 28202  
 Name Address City State Zip Code

**Countrywide Financial Corp. (including Trust2007-5, Countrywide Securities Corp. & Countrywide Home Loans, Inc. as Decedents' mortgager) (collectively "CW")** (see a SEC publication: *SEC v. MOZILO, SAMBOL & SIERACKI*, 09-cv-03994(VBF)(AJWx)(D.C.Cal.):

18. (see above address)  
 Name Address City State Zip Code

**Merrill Lynch & Co. ("MLynch," under Bank of America Global Wealth & Investment Management) (including Merrill Lynch Mortgage Lending, Inc., ML ST-PCV, LLC, ML-CFC Commercial Mortgage Trust 2007-5 & ML-CFC Commercial Mortgage Trust 2007-6; not excluding BlackRock):**

19. (see above address)  
 Name Address City State Zip Code

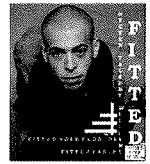
Petition For Leave To Appeal To The Supreme Court Of The United States  
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**BANK OF NEW YORK MELLON CORPORATION ("BNY"):**

20. Gerald Hasser (C.E.O.) (OC)	One Wall Street	New York	NY	10286
	225 Liberty Street	New York	NY	10286
Name	Address	City	State	Zip Code

**Pershing, LLC ("Pershing"):**

21. Lisa Dolly (C.E.O.) (Pershing) (OC, ND)	One Pershing Plaza	Jersey City	NJ	07399
	101 Barclay Street	New York	NY	10286
Name	Address	City	State	Zip Code

22. John Doe (3) (Sr. Broker) (Pershing) (OC, ND)	(see above NJ addresses)			
Name	Address	City	State	Zip Code

**BLACKROCK, INC. \* ("BlackRock"):**

23. Laurence D. Fink (C.E.O.) (OC, ND)	55 East 52 <sup>nd</sup> Street	New York	NY	10055
Name	Address	City	State	Zip Code

**BLACKSTONE ADVISORY PARTNERS, LP \* ("BAP," highlighting partners, subsidiaries & affiliates Blackstone Group Mgmt., LLC, Blackstone Group, LP, Blackstone Group Limited Partnership, LLC, Blackstone Group Holdings, LP & American International Group, Inc., collectively "BlackstoneGrp."):**

**American International Group, Inc. ("AIG"):**

24. Peter D. Hancock (C.E.O.) (OC, ND)	175 Water Street	New York	NY	10038
Name	Address	City	State	Zip Code

**Blackstone ("Blackstone" of BlackstoneGrp.):**

25. Stephen A. Schwarzman (C.E.O.) (OC, ND)	345 Park Avenue	New York	NY	10154
Name	Address	City	State	Zip Code

**Caisse de Dépôt Placement du Québec ("CDPQ" of BlackstoneGrp.):**  
("minority interest" co-owner of *Cirque Du Soleil*,<sup>24</sup> Plaintiffs' previous employer)

26. Michael Sabia (C.E.O.) (OC, ND)	1211 Avenue of Americas, Ste. 3001	New York, NY	10036	
Name	Address	City	State	Zip Code

**Ivanhoe Cambridge ("Ivanhoe" of BlackstoneGrp.):**

27. Daniel Fournier (C.E.O.) (OC, ND)	Édifice Jacques-Parizeau 1001, rue du Square-Victoria	Montréal, Québec	Canada	H2Z 2B5
Name	Address	City	State	Zip Code

\*\*\*\*\*/ \*\*\* Included as defendants for BlackRock are highlighted subsidiaries & affiliates, of which include:

*Blackrock Realty Advisors, Inc., Blackrock Financial Mgmt., Blackrock PCV ST Employee, Investments, LLC, State Street Research & Mgmt. Company (LB-UBS 2007-C1 Trust Fund), Quellos Fund of Funds (Quellos Group, LLC), Barclays Global Investors (Barclays, PLC), Claymore Investments, Inc. (Guggenheim Partners, LLC), Compass Capital Corporation (Compass Funds), PNC Bancorp, Inc. (PNC Financial Services Group, "PNC") & Merrill Lynch Investment Managers.*

*Additionally named are all relevant companies mentioned within BlackRock Inc.'s prospectuses. Specifically those who are associated to the claimed unlawful use of Trust LPSW assets; as such was through UBS's role as Underwriter in PSH's IPO and PSW NYC LLC's controlling power of combined gross incomes to indirectly use Trust LPSW's funds within the asset-backed mortgages of PCV/ST.*



*Petition For Leave To Appeal To The Supreme Court Of The United States  
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**FMR LLC (“FMR,” formally FMR Corp., a.k.a. Fidelity Mgmt. & Research or Fidelity Investments, “Fidelity,” including Fidelity Clearing & Custody Solutions, Fidelity Global Brokerage Services, Inc., Fidelity Brokerage Services LLC, BlackRock Diversified Income Portfolio & Strategic Advisers, Inc.):**

28. <b>Abigail Johnson (C.E.O.) (OC, ND)</b>	245 Summer Street	Boston	MA	02210
Name	Address	City	State	Zip Code

**Fidelity Clearing & Custody Solutions (“FCCS”)  
(formally National Financial Services, LLC, “NFS,” including Correspondent Services Corporation, “CSC,” acquired by NFS):**

29. <b>Sanjiv Mirchandani (President)</b>	200 Seaport Boulevard	Boston	MA	02110
Name	Address	City	State	Zip Code

**Fidelity National Financial, Inc. (“FNF,” subsidiary of Fidelity):**

30. <b>William P. Foley, II (Chairman) (OC, ND)</b>	601 Riverside Avenue	Jacksonville, Florida		32204
Name	Address	City	State	Zip Code

**FORTRESS INVESTMENT GROUP, LLC (“FIG”):**

31. <b>Randal A. Nardone (C.E.O., OC)</b>	1345 Avenue of Americas, Fl. 46	New York, NY		10105
Name	Address	City	State	Zip Code

**CW Financial Services (“CWFS,” including CWCapital Commercial Funding Corp., “CWCFC,” COBALT CMBS Commercial Mortgage Trust 2007-C3 (CDPQ) & COBALT CMBS Commercial Mortgage Trust 2007-C2 (see Wachovia)):**

32. <b>Charles Spetka (C.E.O., OC)</b>	7501 Wisconsin Avenue, Suite 500 West Bethesda, MD 20814			
	555 5th Avenue, Fl. 5	New York	NY	10017
Name	Address	City	State	Zip Code

\*\*\*\*\*/\*\*\*\* (previous page) All subsidiaries and Underwriters are additionally named as defendants (not excluding *Blackstone Advisory Services, LLC, Blackstone Holdings I L.P., Blackstone Holdings II L.P., Blackstone Holdings III L.P., Blackstone Holdings IV L.P., Blackstone Holdings V L.P., Morgan Stanley, Citigroup, Inc., Merrill Lynch & Co., Credit Suisse, Lehman Brothers, Deutsche Bank Securities & invested shareholders of “Beijing Wonderful Investments, China Investment Corp, [BNY Mellon Fund Advisors], [Fidelity], [Morgan Stanley Investment Mgmt.], Janus Capital, Swedbank Robur Fonder AB” (see an analyst report of Blackstone at “http://valueinvestorsclub.com/idea/blackstone\_group\_lp/138823.” Id. at 2.), as such information and other historical information are depicted within Security Exchange Commission (“SEC”) filings.). Additionally, all “existing owners,” as depicted in the entities Form S-1 (not excluding AIG) are also named in their individual associated capacity as defendants. Furthermore, the *Blackstone/GSO Senior Floating Rate Term Fund (including GSO/ Blackstone Debt Funds Mgmt., LLC of GSO Capital Partners, LP)* is also named as a defendant.*

It is additionally highlighted, *BNY (“as of March 31, 2010”) is the Custodian and Transfer Agent for the Blackstone/GSO Senior Floating Rate Term Fund, as detailed within Blackstone’s prospectus, where the “Fund’s custodian is not an affiliate of the Fund, as such term is defined in the Investment Company Act.” [emphasis added] Id. at 47. Further highlighted are a few of the Underwriters of the Fund, who include the services and assets of Morgan Stanley, Citigroup, Inc., Mlynch, UBS, Wells, BOA, RBC Capital Markets as well as the distribution services of ALPS Distributors, Inc.*

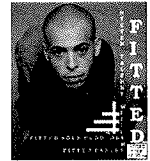
FOOTNOTE 24: See a *Cirque Du Soleil’s* press release, entitled “CIRQUE DU SOLEIL FINDS NEW STRATEGIC MAJORITY PARTNER IN TPG-LED INVESTOR GROUP” (dated April 20, 2015). Source: “<https://www.cirquedusoleil.com/en/press/news/2015/transaction-vente-20-avril-2015.aspx>”



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CompassRock R.E., LLC ("CompassRock," subsidiary of CWFS, currently closed.):

33. David B. Woodward (C.E.O.) (OC, ND)	555 5th Avenue	New York	NY	10017
Name	Address	City	State	Zip Code

34. David Sorise (C.E.O. at the time of the claimed offense) (OC)	(see above address)			
Name	Address	City	State	Zip Code

Walker & Dunlop Capital, LLC (including Walker & Dunlop, Inc., Green Park Financial Limited Partnership & Column Guaranteed LLC (Credit Suisse Securities (USA), LLC) combining assets to collectively form "WDC") & its subsidiary CW Capital Asset Mgmt., LLC ("CWCAM," including Galaxy Acquisition, LLC, as well as other subsidiaries & affiliates, such as FIG, ARA Finance, LLC & Galaxy CF Holdings, LLC):

35. Willy Walker (Chair & C.E.O., WDC) (OC, ND)	535 Madison Ave, Fl. 12	New York, NY	10022
	7501 Wisconsin Ave, Ste. 1200 E.	Bethesda MD	20814
Name	Address	City	State Zip Code

36. David B. Iannarone (C.E.O., CWCAM) (OC)	555 5th Avenue, Fl. 5	New York, NY	10017
	701 13th Street, NW	Washington DC	20005
Name	Address	City	State Zip Code

GRAMERCY PROPERTY TRUST, INC. (formerly Gramercy Capital Corp., "Gramercy," not excluding Gramercy Warehouse Funding I, LLC, Greenberg Traurig, LLP, Citicorp, SLGreen, Wachovia & BNY): (including any "Qualified Transferee.")

37. Gordon F. DuGan (C.E.O.) (OC, ND)	90 Park Avenue, Fl. 32	New York	NY	10016
Name	Address	City	State	Zip Code

TISHMAN SPEYER CROWN ENTITIES (including Tishman Speyer Properties, LP, Tishman Speyer PCV ST Investments, LLC) (collectively "Tishman"):

38. Rob Speyer (C.E.O.) (OC, ND)	45 Rockefeller Plaza	New York	NY	10111
Name	Address	City	State	Zip Code

PSW NYC, LLC \* ("PSW," not excluding WRT PCSTUY, LLC, PCVST DIL, LLC, ST DIL, LLC & the "PCVST Mezzco" series of partnership companies in Trust2007-C30):

Pershing Square Holdings Grp., LLC ("PSH," not excluding Pershing Square Capital Mgmt., LP, Pershing Square, LP, Merrill Corp. Ltd. (London), Howard Hughes Corp., Citigroup, Inc. (2010-2012), Primerica, Deutsche Bank, AG, General Growth Properties, Inc. ("GGP"), GGP Ala Moana, LLC ("GGPAM") & GGP Kapiolani Development, LLC ("GGPKD")):

39. William A. Ackman (C.E.O.) (PSH) (OC, ND)	888 7th Avenue	New York, NY	10019
Name	Address	City	State Zip Code

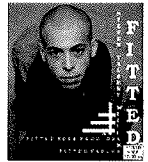
J.P. Morgan, National Associates (including J.P. Morgan Chase bank, National Assoc., J.P. Morgan Securities, LLC, "JPSec.") (collectively "JPMorgan"):

40. James Dimon (C.E.O.) (OC)	270 Park Avenue	New York	NY	10017
(JPSec., Mike Lee, Regional Director)	277 Park Avenue	New York	NY	10172
Name	Address	City	State	Zip Code

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**Winthrop Realty Liquidating Trust \* (“Winthrop,” previously First Union Real Estate Equity and Mortgage Investments, or otherwise as WRT Realty, L.P. or Winthrop Realty Trust, including Cedar Realty Trust, Inc. (BlackRock)):**

41. <b>Michael L. Ashner (C.E.O.) (OC, ND)</b>	250 Royall Street	Canton	MA	02021
Name	Address	City	State	Zip Code

**WELLS FARGO BANK, NATIONAL ASSOCIATES \* (“Wells”):**

42. <b>Timothy J. Sloan (C.E.O.) (OC, renamed)</b>	101 North Phillips Avenue	Sioux Falls, SD	57104
Name	Address	City	State Zip Code

\*\*\*\*\*/ \*\*\*\* (previous page) Included as defendants are highlighted subsidiaries and affiliates, of which include: *Pershing Square, LP; Pershing Square II, LP; Pershing Square International, Ltd.; Pershing Square Holdings, Ltd.; Pershing Square Capital Mgmt. (including Howard Hughes Corp.; GGP Ivanhoe, Inc.; Brookfield Asset Mgmt., Inc.; REP Investments, LLC, BOA & Wachovia); Fortune Brands; General Growth Properties; Canadian Pacific Railroad; Rothschild Bank, AIG; Citigroup, Inc. (including Citigroup Commercial Mortgage Securities, Inc. (“CCMS”), Citigroup Global Markets, Inc., the involvement of Primerica, Inc.<sup>25</sup> as well as BNY as trustee to Citigroup’s 2010 trust) & other affiliated companies and trusts depicted within PSH’s IPO, such as: Deutsche Bank, AG, Elysium Fund Mgmt. Limited, Morgan Stanley Fund Services (Bermuda) Limited, Rothschild Wealth Mgmt., UBS, Deutsche, Credit Suisse, ABN AMRO, BTG Pactual, CIBC, Dexion Capital plc & others.*

FOOTNOTE 25: In the controversial year of Trust LPSW funds being withheld from Plaintiffs’ ownership, 2010, *Primerica, Inc.* (subsidiary of *Citigroup*) created an IPO utilizing *UBS* and *Citigroup* as Underwriters. See *Primerica’s* prospectus.

\*\*\*\*\*/ \*\*\*\*/ \* Included as defendants under *Winthrop* are highlighted subsidiaries and affiliates, including: *FUR Advisors, LLC; MacKenzie Partners, Inc.; Bear, Stearns & Co., Inc.; KeyBanc Capital Markets (McDonald Investments, Inc.); Fairholme Ventures II, LLC; Goldman, Sachs & Co.; Spectrum Partners, LP; Omicron Master Trust; New Valley, LLC; as well as Cedar Realty Trust, Inc.<sup>26</sup>*

FOOTNOTE 26: See a SEC Annual Report (fiscal year ending December 31, 2014) for *Cedar Realty Trust, Inc.*, “[Mr. Roger M. Widmann is] a director since 2003, [and] the non- executive Chairman of the Board since June 2011[.]”

See also a *Standard Motor Products, Inc.* (“SMP,” associated defendant) 2013 proxy statement, “[BlackRock] states that it beneficially owns an aggregate of 1,576,568 shares of our Common Stock.

Source: “<http://www.smpcorp.com/upload/Corporate%20Site/documents/2013%20Proxy%20Statement.pdf>.”

See also a *friscofastball.com* news article, entitled “Noteworthy Price Action: Cedar Realty Trust Inc’s Stock Is Sell” (by Vivian Park, dated November 9, 2016), where “Blackrock Group Inc Ltd has 586,144 shares” of stocks in *Cedar Realty Trust, Inc.*

Source: “<http://friscofastball.com/2016/11/09/noteworthy-price-action-cedar-realty-trust-incs-stock-is-sell-after-touching-yearly-low>.”

See also a SEC *Winthrop* publication, entitled “**WINTHROP REALTY TRUST ANNOUNCES RESULTS FOR FIRST QUARTER 2012**” (dated May 3, 2012), signifying *Winthrop* “[p]urchased... shares of... Cedar Realty Trust, Inc. for an aggregate purchase price of approximately \$4.16 million... 6.1 million shares[.]”

Source: “[https://www.sec.gov/Archives/edgar/data/37008/000119380512000837/e609663\\_ex99-1.htm](https://www.sec.gov/Archives/edgar/data/37008/000119380512000837/e609663_ex99-1.htm).”

Consequently, in the year 2013, *Winthrop* “[r]ealized net proceeds of approximately \$17.2 million through the sale of 3.25 million common shares of Cedar Realty Trust.” See a *thetstreet.com* news article, entitled “Winthrop Realty Trust Announces Results For Fourth Quarter And Full Year 2012” (by GlobeNewswire, dated Mar 7, 2013). *Id.* at 3.

Source: “<https://www.thetstreet.com/story/11862559/2/winthrop-realty-trust-announces-results-for-fourth-quarter-and-full-year-2012.html>.”

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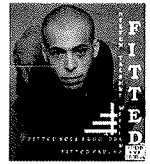


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**Wachovia Bank, National Association \* (subsidiary of Wells, including Wachovia Capital Markets, LLC, Wachovia Commercial Mortgage Securities, Inc.) (collectively "Wachovia"):**

**43. G. Kennedy Thompson (C.E.O.) (OC) 8739 Research Drive URP 4 Charlotte, NC 28262**

Name	Address	City	State	Zip Code
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- a. **Wachovia Bank Commercial Mortgage Trust 2007-C30 ("Trust2007-C30," highlighting BOA as trustee), not excluding affiliated financial institutions, such as:**
  - i. **PCV Owner, LP & ST Owner, LP (collectively "PCV/ST Owner"); PCV ST Nominee Holdings, LP; PCV ST JV, LLC; ST Bridge Mezz, LP; the "PCV ST Mezz GP" & "ST Mezz GP" series of companies; Guilford Funding Corporation; BR Realty Advisors, Inc; BR PCV ST Investments, LLC; LNR Property Holdings, Ltd. (LNR Partners, Inc. "LNR through its subsidiaries, affiliates and joint ventures, is involved in the real estate investment[.]" See a Cadwalader, Wickersham & Taft, LLP publication of *BANK OF AMERICA v. PCV ST OWNER LP*, 10-Cv-1178(AHK)(SDNY) *Id.* at 1; American Capital, Ltd. ("AC," including American Capital Financial Services, Inc., American Capital Strategies Ltd. ("ACS"), American Capital, LLC, as well as ACAS CRE CDO 2007-1 Depositor, LLC & ACAS CRE CDO 2007-1, Ltd., of the ACAS2007-1 trust mentioned below); Fortress; SL Green Operating Partnership, LP (Centerbridge Partners); Peter Cooper Village Stuyvesant Town Partners, LP; and Peter Cooper Village Stuyvesant Town Partners II, LP;**
- b. **COBALT CMBS Commercial Mortgage Trust 2007-C2 ("Trust2007-C2," including "Ala Moana Portfolio properties," serviced by Deutsche as "depositor" of the portfolio into the CD 2006-CD3 Mortgage Trust securitization. ("Trust2006-CD3," a side trust to the mortgaged loans of PCV/ST) and COBALT CMBS Commercial Mortgage Trust 2007-C3 ("Trust2007-C3." See CWFS);**
- c. **ML-CFC Commercial Mortgage Trust 2007-5 ("Trust2007-5") (previously mentioned under MLynch & Countrywide);**
- d. **ML-CFC Commercial Mortgage Trust 2007-6 ("Trust2007-6") (previously mentioned under MLynch & Countrywide); and**
- e. **Wachovia Bank Commercial Mortgage Trust Series 2007-C31 ("Trust2007-C31");**
- f. **Additional CDO and other trusts affiliated to Trust2007-C30 and named defendants such as:**
  - i. **LB-UBS 2007-C1 Trust Fund ("LB-UBS Trust," containing LB-UBS Commercial Mortgage Trust 2007-C1 & Commercial Mortgage Pass Through Certificates, Series 2007-C1, highlighting the companion loan of the State Street Financial Center Loan, without excluding affiliated companies Wells Real Estate Investment Trust II, Inc.; Broadway Real Estate Partners, LLC; U-Store-It Trust (Amadell Companies); Lembi Grp., Melvin Heller/Robert Siegel CBL & Assoc. Properties, Inc.; Macquarie DDR Trust; ABN AMRO Bank, N.V.; Allied Capital Corporation; KeyCorp. Real Estate Capital Markets, Inc.; Midland Loan Services, Inc.; LaSalle Bank NA ("LaSalle"); Structured Asset Securities Corporation II);**

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- ii. AC, LNR Partners, Inc. ("LNR," including LNR Securities Holdings) & CWCAM as "noteholders and controlling class representatives" of a related trust account, ACAS CRE-CDO 2007-1 ("ACAS2007-1," "managed by [American Capital CRE Mgmt., LLC]," a subsidiary of AC), not excluding all associated series of trusts to PCV/ST's mortgaged loans, comprising of "[Trust2007- C31]; [Trust2007-5]; and [Trust2007-6]. See *Opp. Br. Ex. 2 at § 3.25(a), Ex. 11*[:]"
- iii. COBALT CMBS Commercial Mortgage Trust 2006-C1 ("Trust2006-C1") (directly invested through CWCAM as the depositor of the "Ala Moana Portfolio properties," which are owned by GGPAM, a indirectly invested by PSH), including all associated companies, such as: CWCAM; CWCFC; Wachovia; Citigroup; German American Capital Corp.; Artesia Mortgage Capital Corp.; Deutsche; and others;
- iv. Dreyfus Fund, Inc. (of The Dreyfus Corporation, a subsidiary of BNY, collectively "Dreyfus"), not excluding subsidiaries, affiliates and other relationships with invested entities, such as: Dreyfus Strategic Municipal Inc., Lockwood Capital Mgmt., Inc., MBSC Securities Corporation ("MBSC"), UBS, MLynch & BOA;
- v. PNK Finance Corporation ("PNK," a subsidiary of Pinnacle Entertainment, Inc.), not excluding the "Representatives" for "Initial Purchasers," of which include: JPSec.; Goldman, Sachs & Co., Deutsche Bank Securities Inc.; Merrill Lynch, Pierce, Fenner & Smith Incorporated; Wells; Credit Agricole Securities (USA) Inc.; Barclays Capital Inc.; UBS; & other entities, wherein a merger (the "Ameristar Merger," between PNK Holdings, Inc. (subsidiary of Pinnacle (PNK)) and Holdco to form Ameristar Casinos, Inc.) was agreed upon by Holdco, PNK Development 32, Inc. & Ameristar Casinos, Inc.. It is highlighted, the trustee for the PNK's "Senior Notes" is BNY., wherein such assets of the Senior Notes were divided in multiple CDOs;
- vi. Primerica, Inc.'s IPO (including UBS, Deutche, Morgan Stanley, Warburg Pincus Private Equity X L.P. as underwriters, as well as the involvement of Citigroup, Warburg Pincus X Partners, L.P. & National Benefit Life Insurance Co., "NBL," (alleged as being a Trust LPSW life insurance company holding an insolvent policy for Plaintiff's benefit); and
- vii. other mentionable CDOs and trusts.

"Bondholders"<sup>27</sup> \* previously of Trust2007-C30 & subsequent trusts) (highlighting foreign invested entities registered with Nat. Registered Agents, Inc., such as: Church of England, Government of Singapore, CalPERS, CalSTRS, Fannie Mae, Freddie Mac & other foreign invested entities, including retirement accounts associated to Deutche and the New York State & Local Retirement System):

44. **Nat. Registered Agents, Inc.,** Ste. 501, 875 Avenue of Americas New York, NY 10001

Name	Address	City	State	Zip Code
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FOOTNOTE 27: See a NYMag.com news article, entitled "The Biggest, Baddest Real-Estate Loan[:] Tishman Speyer's \$3.4 billion Stuyvesant Town Mistake" (by Gabriel Sherman).

Source: "<http://nymag.com/realestate/features/62880>."

See also a Pionline.com news publication, entitled "Terminations can't keep real estate managers down: Despite losses, real estate firms still can win new business from pension funds" (by Arleen Jacobius).

Source: "<http://www.pionline.com/article/20120806/PRINT/308069991/terminations-cant-keep-real-estate-managers-down>."



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**UBS AG \* ("UBS," not excluding UBS/PaineWebber & UBS Investment Bank):**

45. Sergio P. Ermotti (C.E.O.) (OC, ND)	1285 Avenue of Americas	New York	NY	10019
	299 Park Avenue	New York	NY	10171
Name	Address	City	State	Zip Code

**US BANK, NATIONAL ASSOCIATION \* ("US Bank," associated to Trust2007-C31):**

46. Richard K. Davis (Chairman & C.E.O.) (OC)	800 Nicollet Mall,	Minneapolis	MN	55402
Name	Address	City	State	Zip Code

**A.3 – Legal Representation for CWCAM & PCV/ST Owner at the Time of Eviction.**

**BORAH, GOLDSTEIN, ALTSCHULER, NAHINS & GOIDEL, PC ("BGANG"):**

47. Myron I. Altschuler (Sr. Partner, BGANG)(Queens)	108-18 Queens Blvd.	Forest Hills,	NY	11375
	(Manhattan) 377 Broadway	New York,	NY	10013-3993
Name	Address	City	State	Zip Code

48. David R. Brody (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

49. Eric M. Goidel (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

50. Robert D. Goldstein (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

51. Todd I. Nahins (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

\*\*\*\*\*/\*\*\*\*\*/\*\* (previous page) *The management for PCV/ST during the time period of the 2012 eviction was CWCAM. Other Bondholders for PCV/ST at the time of the eviction include: California Public Employees' Retirement System ("CalPERS"); California State Teachers' Retirement System ("CalSTRS"); Florida State Board of Administration; & other entities.*

\*\*\*\*\*/\*\*\*\*\*/\*\*\* *Included as defendants under UBS are highlighted subsidiaries and affiliates, of which include: UBS Financial Services, Inc.; UBS Fiduciary Trust Company; Paine Webber Capital, Inc.; UBS Eucalyptus Mgmt., L.L.C.; UBS Juniper Mgmt., L.L.C.; UBS Sequoia Mgmt., L.L.C.; UBS Swiss Financial Advisors AG; UBS AG, New York Branch; UBS Trust Company, N.A.; UBS Willow Mgmt., L.L.C.; UBS Tamarack Mgmt., L.L.C.; as well as investments within companies such as Barclays Bank PLC; JPMorgan; BlackRock; BlackstoneGrp.; & others*

52. Harriet M. Polinsky (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

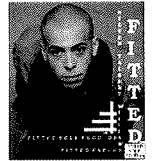
53. David B. Rosenbaum (Sr. Partner, BGANG)	(see above addresses)			
Name	Address	City	State	Zip Code

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54. **Stephen C. Shulman (Sr. Partner, BGANG)** (see above addresses)  

Name	Address	City	State	Zip Code
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55. **John Doe (1) (renamed, legal rep. of BGANG, Index No. 52069/12(JHS)(NYHC))**  
 (see above addresses)  

Name	Address	City	State	Zip Code
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56. **Gregory J. Claude (legal rep. of PCV/ST & BGANG)** (see above addresses)  

Name	Address	City	State	Zip Code
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**Curtis, Mallet – Prevost, LLP (“CM-P”):**

57. **Francesca M. Erts (legal “rep.” for PCV/ST & BGANG)** 101 Park Avenue New York, NY 10178  

Name	Address	City	State	Zip Code
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**A.4 – Legal Representation for Estate LPSW & Trust LPSW.**

58. **Avrom R. Vann, P.C. (“Vann, P.C.”)** 420 Lexington Avenue, Ste. 2400 New York, NY 10170  

Name	Address	City	State	Zip Code
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59. **Avrom R. Vann (owner of Vann, P.C.) (Personal address unknown, see above address)**  

Name	Address	City	State	Zip Code
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**PART B – SUBSEQUENT PRIMARY DEFENDANTS**

**B.1 – Federal & Local Government.**

**UNITED STATES DEPARTMENT OF JUSTICE (“U.S.D.O.J.”):**

**United States Attorney General (“U.S.A.G.”):**

60. **Mr. Matthew M. Whitaker (serving OC)** 950 Penn Avenue, NW Washington DC 20530-0001  

Name	Address	City	State	Zip Code
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**New York State Attorney General (“N.Y.A.G.”) (OC, under U.S.A.G. Lynch):**

61. **Eric T. Schneiderman (OC)** Office of N.Y.S.A.G., The Capitol Albany NY 12224-0341  

Name	Address	City	State	Zip Code
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**New York State Unified Court System & Office of Court Administration (“N.Y.S.U.C.S.”):**

62. **Hon. Chief J. Janet DiFiore (OC, ND)** 4 ESP, Ste. 2001 Empire State Plaza Albany, NY 12223-1450  

Name	Address	City	State	Zip Code
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63. **Hon. Chief Admin. J. Lawrence K. Marks (OC, ND)** 25 Beaver St, Rm. 852 New York, NY 10004  

Name	Address	City	State	Zip Code
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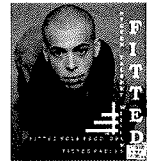
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64. **Angela Badamo** (ND) (Asst. Deputy Counsel of the N.Y.S.U.C.S. & O.C.A.) (see above addresses)  
Name Address City State Zip Code

New Jersey State Attorney General ("N.J.A.G.") (OC, under U.S.A.G. Lynch):

65. **Christopher Porrino** (OC, ND) R.J.H. Justice Complex 25 Market St., Box 080 Trenton, NJ 08625-008  
Name Address City State Zip Code

District of Columbia Attorney General ("D.C.A.G.") (OC, under U.S.A.G. Lynch):

66. **Karl A. Racine** 441 4th Street, NW Washington DC 20001  
Name Address City State Zip Code

Maryland State Attorney General ("M.S.A.G.") (OC, under U.S.A.G. Lynch):

67. **Brian E. Frosh** 200 Saint Paul Place Baltimore MD 21202  
Name Address City State Zip Code

Surrogate Court of the County of New York ("S.C.N.Y.," oversight sought):

68. **Chief Clerk Diana Sanabria** 31 Chambers Street New York NY 10007  
Name Address City State Zip Code

69. **John Doe (2), Admin. Clerk ("Mr. Silver," renamed, prior reference as "Mr. White")** (Personal address unknown) (allegedly informed Mr. Silver was transferred to the Bronx surrogate court)  
Name Address City State Zip Code

UNITED STATES POSTAL SERVICE ("U.S.P.S.," mail fraud related):

70. **James H. Bilbray** (Chairman) (OC, ND) 475 L'Enfant Plaza SW Washington, DC 20260-0010  
Name Address City State Zip Code

71. **Megan J. Brennan** (Postmaster General & C.E.O.) (OC, ND) (see above address)  
Name Address City State Zip Code

72. **Thomas J. Marshall** (Gen. Counsel & Exec. Vice Pres., ND) (see above address)  
(location of occurrence: *Madison Sq. Mgr. 149 East 23rd Street New York, NY 10010-9998*)  
Name Address City State Zip Code

**B.2 – Other Primary Defendants.**

STATE FARM LIFE INSUR. CO. ("StateFarm"):

73. **Edward B. Rust, Jr.** (Chairman & C.E.O.) (OC) One State Farm Plaza Bloomington, IL 61710  
Name Address City State Zip Code

74. **Kevin Leong** (StateFarm agent) 134 West 20th Street, Frnt. 1 New York NY 10011-3606  
Name Address City State Zip Code

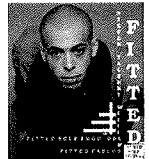




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## PART C – SECONDARY DEFENDANTS

### *C.1 – United States Agencies.*

#### U.S.D.O.J. (due process related):

#### Maryland Administrative Office of the Courts (“MAOC”):

##### 75. Hon. Chief J. Mary Ellen Barbera (OC, ND)

Robert C. Murphy Courts of Appeal Bldg., 361 Rowe Blvd., Annapolis, MD 21401

Name	Address	City	State	Zip Code
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##### 76. Pamela Q. Harris (State Court Admin.) (OC, ND)

Maryland Judicial Center, 580 Taylor Avenue, Annapolis, MD 21401

Name	Address	City	State	Zip Code
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#### New York City Transit Adjudication Bureau (“T.A.B.,” ND):

##### 77. John/Jane Doe (1), T.A.B. Hearing Officer (renamed, Violation No. 110944195(TAB))

29 Gallatin Place Brooklyn NY 11201

Name	Address	City	State	Zip Code
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##### 78. Karen M. Ortiz, Esq. (ND, legal rep. for T.A.B.)

(not confirmed) 177 Livingston Street Brooklyn, NY 11201-7000

Name	Address	City	State	Zip Code
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#### District Attorney Office of the County of New York (“D.A. Office”):

##### 79. D.A. Cyrus R. Vance, Jr. (OC)

One Hogan Place New York NY 10013

Name	Address	City	State	Zip Code
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##### 80. D.A. Sophia “Khon” (or “Khan,” unverified, referenced as “D.A. Khon”) (Personal address unknown)

Name	Address	City	State	Zip Code
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##### 81. John Doe (4), Asst. D.A. (“Asst. D.A. ‘Abren,’” renamed) (Personal address unknown)

Name	Address	City	State	Zip Code
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#### Supreme Court of the City of New York, Kings County, Civil Term (“N.Y. S.Ct., Kings Co., Civ.”):

##### 82. Hon. Lawrence Knipel (Admin. Judge) (OC, ND) 360 Adams Street Brooklyn, NY 11201

Name	Address	City	State	Zip Code
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##### 83. Chief Clerk Charles A. Small, Esq. (N.Y. S.Ct., Kings Co., Civ.) (OC, ND) (see above address)

Name	Address	City	State	Zip Code
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#### Southern District Court of the State of New York (“S.D.N.Y.,” ND):

(including the Assignment Committee or any unbeknownst Administrative Appointee)

##### 84. Hon. Chief J. Loretta A. Preska 500 Pearl Street

New York NY 10007

Name	Address	City	State	Zip Code
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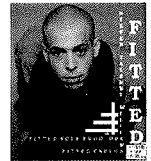
*Petition For Leave To Appeal To The Supreme Court Of The United States  
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*In re.: Cestui Que Steven Talbert Williams v.  
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<b>85. Pro Se Intake Unit</b>	500 Pearl Street, Rm. 200	New York	NY	10007
Name	Address	City	State	Zip Code

**UNITED STATES DEPARTMENT OF TRANSPORTATION ("U.S.D.O.T."):**

<b>86. Sec. Anthony Foxx (OC)</b>	1200 New Jersey Avenue, SE	Washington	DC	20590
Name	Address	City	State	Zip Code

**District of Columbia Department of Transportation ("D.C.D.O.T.," OC, over Sun Cab Co.):**

<b>87. Dir. Leif A. Dormsjo (OC)</b>	55 M Street, SE, Ste. 400	Washington	DC	20003
Name	Address	City	State	Zip Code

**District of Columbia Taxicab Commission ("D.C.T.C.," OC, over Transdev & Sun Cab Co.):**

<b>88. Ernest Chrappah (OC)</b>	Exec. Offices, Ste. 3001 2235 Shannon Place, SE	Washington, DC	20020
Name	Address	City	State Zip Code

**Transdev North America ("Transdev," through D.C.T.C., OC, over Veolia & Sun Cab Co.):**

<b>89. Mark Joseph (C.E.O. &amp; Vice Chairman) (OC)</b>	720 E Butterfield Rd, Ste. 300	Lombard, IL	60148
Name	Address	City	State Zip Code

<b>90. Ken Westbrook (OC, ND) (Chair., Pres. &amp; C.O.O., Transdev Transit Division)</b>	(see above address)			
Name	Address	City	State	Zip Code

**Veolia Transportation ("Veolia") (D.C.T.C.) (OC, over Sun Cab Co. & John Doe (9)):**

<b>91. (recently acquired by Transdev)</b>	(see above address)			
Name	Address	City	State	Zip Code

**Sun Taxicab (or Sun Taxicab Assoc. Ltd., "Sun Cab Co.," through D.C.T.C.) (OC):**

<b>92. Brian Dillard (renamed, OC, ND, acquired by Transdev &amp; original ownership of Veolia)</b>	8601 Georgia Avenue, Ste. 703	Silver Spring	MD	20910
Name	Address	City	State	Zip Code

<b>93. John Doe (9) (renamed) (driver, Sun Cab Co.)</b>	(Personal address unknown, see above address)			
Name	Address	City	State	Zip Code

**Montgomery County Department of Transportation ("M.C.D.O.T.," OC over Sun Cab Co.):**

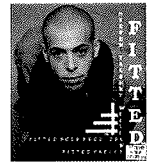
<b>94. Dir. Al Roshdiegh (OC)</b>	101 Monroe Street, Fl. 10	Rockville	MD	20850
Name	Address	City	State	Zip Code

**New York State Department of Transportation ("N.Y.S.D.O.T.," OC over T.A.B. & M.T.A.):**

<b>95. Comm. Matthew J. Driscoll (OC, ND)</b>	Main Office, 50 Wolf Road, Fl. 1	Albany, NY	12232
Name	Address	City	State Zip Code

<b>96. Asst. Comm. Jan McLachlan (OC, ND)</b>	(Gen. Counsel, Div. of Legal Affairs) (see above address)			
Name	Address	City	State	Zip Code

*Petition For Leave To Appeal To The Supreme Court Of The United States  
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**New York City Department of Transportation ("N.Y.C.D.O.T.," OC over T.A.B. & M.T.A.):**

97. **Comm. Polly Trotenberg** (OC, ND) 55 Water Street, Fl. 9 New York NY 10041  
Name Address City State Zip Code

98. **Borough Comm. Margaret Forgione** (OC) (N.Y.C.D.O.T.) (see above address)  
Name Address City State Zip Code

**New York City Transit Authority ("N.Y.C.T.A.," OC over T.A.B. & M.T.A.):**

99. **Pres. Veronique Hakim** (OC, ND) 2 Broadway New York NY 10004  
Name Address City State Zip Code

**New York City Metropolitan Transit Authority ("M.T.A.," N.Y.P.D.):**

100. **Thomas F. Prendergast** (Chairman & C.E.O.) (OC) 347 Madison Avenue New York, NY 10017-3739  
Name Address City State Zip Code

101. **John Doe (5), M.T.A. (N.Y.P.D.)**  
(renamed, Violation No. 109705119(TAB), "Mr. 'LEVERIAN") (address unknown)  
Name Address City State Zip Code

102. **John Doe (6), M.T.A. (N.Y.P.D.) (renamed, Violation No. 109705119(TAB))** (address unknown)  
Name Address City State Zip Code

103. **Mr. Harold M. "Quezada," M.T.A. (N.Y.P.D.) (ND)** (Violation No. 110944195(TAB))(address unknown)  
Name Address City State Zip Code

104. **(ND's) Unknown M.T.A. (N.Y.P.D.) police officers during Violation No. 110944195(TAB)**  
Name Address City State Zip Code

**UNITED STATES DEPARTMENT OF LABOR ("U.S.D.O.L.," OC over N.Y.S.D.O.L.):**

105. **Sec. Thomas E. Perez** (OC) 200 Constitution Avenue, NW Washington DC 20210  
Name Address City State Zip Code

**New York State Department of Labor ("N.Y.S.D.O.L.):**

106. **Comm. Roberta Reardon** (OC) Building 12 W.A. Harriman Campus Albany, NY 12240  
Name Address City State Zip Code

107. **Hon. Wendy Pichardo** (Admin. Law Judge, ND) 9 Bond Street, Fl. 4 Brooklyn, NY 11201-5801  
Name Address City State Zip Code

**UNITED STATES DEPARTMENT OF HEALTH & HUMAN SERVICES ("U.S.H.H.S.):**

108. **Sec. Sylvia Mathews Burwell** (OC) 200 Independent Avenue, SW Washington, DC 20207  
Name Address City State Zip Code

**New York State Department of Health ("N.Y.D.O.H.):**

109. **Comm. Howard Zucker** (OC) Corning Tower, Empire State Plaza Albany NY 12237  
Name Address City State Zip Code

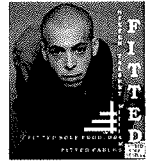
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**Maryland Department of Health & Mental Hygiene ("D.H.M.H."):**

**110. Sec. Van T. Mitchell (OC)**

Herbert R. O'Connor State Office Bldg., 201 West Preston Street Baltimore, MD 21201-2399

Name	Address	City	State	Zip Code
Herbert R. O'Connor	201 West Preston Street	Baltimore	MD	21201-2399

**C.2 – Other Defendants Located within New York State.**

**NEW YORK DEPARTMENT OF STATE ("N.Y.D.O.S."):**

Name	Address	City	State	Zip Code
111. Gov. Andrew Cuomo (OC)	New York State Capitol Bldg.	Albany	NY	12231-0001

Name	Address	City	State	Zip Code
112. Mayor Bill de Blasio (OC, New York City)	City Hall	New York	NY	10007

Name	Address	City	State	Zip Code
113. Linda Baldwin (Gen. Counsel, OC)	One Commerce Plaza, 99 Washington Avenue	Albany, NY	12231-0001	

Name	Address	City	State	Zip Code
114. Mayor Thomas M. Roach (OC, White Plains)	City Hall, 255 Main Street	White Plains, NY	10601	

**NEW YORK CITY POLICE DEPARTMENT ("N.Y.P.D."):**

Name	Address	City	State	Zip Code
115. Comm. James O'Neill (OC, renamed)	N.Y.P.D. One Police Plaza	New York, NY	10038	

**New York City Department of Homeless Services ("D.H.S.," N.Y.P.D.):**

Name	Address	City	State	Zip Code
116. Comm. Steven Banks (OC, ND, renamed)	33 Beaver Street, Fl. 17	New York, NY	10004	

Name	Address	City	State	Zip Code
117. Mr. ("Roberto O.") Rodriguez, D.H.S. (N.Y.P.D.)	(address unknown)			

Name	Address	City	State	Zip Code
118. Jane Doe (2), D.H.S. (N.Y.P.D.) (renamed)	(address unknown)			

**Patrol Borough of Queens South ("P.B.Q.S.," N.Y.P.D.):**

Name	Address	City	State	Zip Code
119. Asst. Chief David Barrere (unverified)	6840 Austin Street	Flushing	NY	11375

Name	Address	City	State	Zip Code
120. Jane Doe (7) (RockGrp. security guard of the P.B.Q.S. on paid detail)	(see above address)			

Name	Address	City	State	Zip Code
121. N.Y.P.D.'s 20TH PRECINCT (Tax No. "947406")	(see above address)			

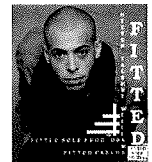
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In re.: *Cestui Que Steven Talbert Williams v.*  
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122. **POLICE OFFICER MR. FRANSISCO ROA** (address unknown)(Ticket No. 0203004955(OATH))  
 Name Address City State Zip Code

123. **All other police officers of N.Y.P.D.'s 20TH PRECINCT**  
 Name Address City State Zip Code

**C.3 – Other Defendants Located within White Plains, N.Y. (Supplemental Jurisdiction).**

**WHITE PLAINS DEPARTMENT OF PUBLIC SAFETY (“W.P.D.P.S.”):**

124. **Comm. David E. Chong (OC)** 77 South Lexington Avenue White Plains NY 10601  
 Name Address City State Zip Code

**White Plains City Police Department (“W.P.P.D.”):**  
 (location of occurrence at *FedEx*, 137 E. Post Road, White Plains, NY 10601)

125. **John Doe (7), W.P.P.D.** (Personal address unknown, see above address)  
 Name Address City State Zip Code

126. **John Doe (8), W.P.P.D.** (Personal address unknown, see above address)  
 Name Address City State Zip Code

**WHITE PLAINS HOSPITAL (“W.P. Hosp.”):**

127. **Laurence Smith (Chairman, W.P. Hosp., OC)** 41 East Post Road White Plains, NY 10601  
 Name Address City State Zip Code

128. **Dr. Joseph Hassan (W.P. Hosp.)** (Personal address unknown)  
 Name Address City State Zip Code

129. **Justin Donjte, Nurse (W.P. Hosp.)** (Personal address unknown)  
 Name Address City State Zip Code

130. **Jane Doe (3), Nurse (W.P. Hosp.)** (Personal address unknown)  
 Name Address City State Zip Code

**C.4 – Other Defendants Located within Maryland State (Diversity Jurisdiction).**

131. **Gov. Larry Hogan (OC, ND)** 100 State Circle Annapolis MD 21401-1925  
 Name Address City State Zip Code

132. **Sec. John C. Wobensmith (OC, ND)** 16 Francis Street Annapolis MD 21401  
 Name Address City State Zip Code

133. **Mayor Jim Durrett (Mont. Co.) (OC, ND)** 1 Millennium Plaza Clarksville, TN 37040  
 Name Address City State Zip Code



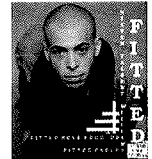
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**MARYLAND PUBLIC SERVICE COMMISSION ("M.P.S.C."):**

134. **W. Kevin Hughes, Esq. (Chairman) (OC, ND)**

William Donald Schaefer Tower 6 Saint Paul Street Baltimore, MD 21202-6806

Name	Address	City	State	Zip Code
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**Maryland Department of Public Safety & Correctional Services ("M.D.P.S.C.S."):**

135. **Sec. Stephen T. Moyer (OC)** 300 East Joppa Road, Ste. 1000 Towson MD 21286-3020

Name	Address	City	State	Zip	Code
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**Maryland Division of Correction ("M.D.O.C."):**

136. **Comm. Dayena M. Corcoran (OC, ND)** 6776 Reisterstown Road, Ste. 311 Baltimore, MD 21215-2342

Name	Address	City	State	Zip Code
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**Montgomery County Police Department ("M.C.P.D."):**

137. **Chief J. Thomas Manger (renamed)**

Public Safety Headquarters, 100 Edison Park Dr. Gaithersburg, MD 20873

Name	Address	City	State	Zip Code
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138. **John Doe (10) (police officer, renamed, M.C.P.D.) (Personal address unknown)**

Name	Address	City	State	Zip Code
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139. **Jane Doe (4) (police officer, renamed, M.C.P.D.) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**Montgomery County District Court ("M.C. Dist. Ct.," Rockville Court):**

140. **Hon. Chief J. John P. Morrissey (OC, ND)**

Maryland Judicial Center, 580 Taylor Avenue, Annapolis, MD 21401

Name	Address	City	State	Zip Code
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141. **Hon. Eugene Wolfe (Dist. Administrative Judge) (OC, ND)**

District Court Building, 191 East Jefferson St., Rockville, MD 20850 - 2630

Name	Address	City	State	Zip Code
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142. **John/Jane Doe (2) (incarcerating judge, renamed) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**MONTGOMERY COUNTY DEPARTMENT OF CORRECTION & REHABILITATION ("M.C.D.C.R."):**

143. **Robert L. Green (Director) (OC, ND)** 22880 Whelan Lane Boyds MD 20841

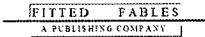
Name	Address	City	State	Zip Code
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**Montgomery County Detention Center ("M.C.D.C."):**

144. **Suzy Malagari (Warden) (OC, ND)** 1307 Seven Locks Road Rockville MD 20854

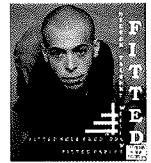
Name	Address	City	State	Zip Code
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*Petition For Leave To Appeal To The Supreme Court Of The United States  
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**Central processing Unit ("C.P.U.," within M.C.D.C.):**

**145. John Doe (11), C.P.U. (M.C.D.C.) (renamed, "C.O.") (Personal address unknown)**

Name	Address	City	State	Zip Code
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**Commissioner Office Posting Bail ("C.P.B.," within M.C.D.C.):**

**146. John/Jane Doe (3) (Bail bondsman, renamed) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**Montgomery County Correctional Facility ("M.C.C.F.):**

**147. Gale Starkey (Dep. Warden of Programs & Services, OC) 22880 Whelan Lane, Boyds, MD 20841**

Name	Address	City	State	Zip	Code
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**Crisis Intervention Unit ("C.I.U.," within M.C.C.F.):**

**148. John Doe (12), C.I.U. (M.C.C.F.) (renamed, C.O.) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**149. John Doe (13), C.I.U. (M.C.C.F.) (renamed, C.O.) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**Mental Health Services ("M.H.S.," within C.I.U., M.C.C.F.; Dialectical Behavior Therapy)**

**150. Dr. Lauren Campbell, Ph. D. (Prg. Admin., M.H.S. (M.C.C.F.), OC) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**151. John Doe (14), M.H.S. (C.I.U., M.C.C.F.) (renamed, Psychiatrist) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**C.5 – Other Named Secondary Defendants.**

**AMALGAMATED LIFE INSURANCE CO. ("Amal. Life"):**

**152. David J. Walsh (C.E.O., OC) 333 Westchester Avenue White Plains NY 10604**

Name	Address	City	State	Zip Code
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**153. John Doe (17) (renamed, Security Officer) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**154. Jane Doe (5) (renamed, Insurance Agent) (Personal address unknown)**

Name	Address	City	State	Zip Code
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**BARNES & NOBLE, INC. ("B&N"):**

**155. Leonard Riggio (C.E.O., OC) 122 Fifth Avenue New York NY 10011**

Name	Address	City	State	Zip Code
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**156. John Doe (18) (B&N Manager) Union Sq. location: 33 E 17<sup>th</sup> Street New York, NY 10003**

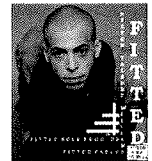
Name	Address	City	State	Zip Code
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157. John Doe (19) (N.Y.P.D. Detective "*DiPardo*") (personal address unknown)

Name	Address	City	State	Zip Code
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158. Jane Doe (6) (B&N Security officer) (personal address unknown)

Name	Address	City	State	Zip Code
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159. John Doe (20) (N.Y.P.D. officer, unverified name of "*Mr. Smith*," badge number "*18122*")  
(personal address unknown)

Name	Address	City	State	Zip Code
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**BREAKING GROUND ("B.G.," formerly known as *Common Ground*, "C.G."):**

160. Brenda E. Rosen (C.E.O., OC) 505 Eighth Avenue, Fl. 5 New York NY 10018

Name	Address	City	State	Zip Code
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161. Central Intake Unit 255 West 43<sup>rd</sup> Street New York NY 10036

Name	Address	City	State	Zip Code
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**FEDERAL EXPRESS ("FedEx"):**

162. Frederick W. Smith (C.E.O., OC) 942 South Shady Grove Road Memphis, TN 38120

*FedEx store location:* 257 Park Avenue South New York NY 10010

Name	Address	City	State	Zip Code
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**FITTEDSOLE, LLC & FITTEDSOLE CLOTHING CO. ("FittedSole"):**

163. Daryl Vershawn Cobbs (of *Diverse Community Investments, LLC*)

4918 West Medford Avenue Milwaukee WI 53216

Name	Address	City	State	Zip Code
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**GOOGLE, INC. ("Google Mail"):**

164. Larry Page (C.E.O., OC) 1600 Amphitheatre Pkwy. Mountain View CA 94043

*New York Headquarters:* 76 Ninth Avenue, Fl. 4 New York NY 10011

Name	Address	City	State	Zip Code
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**NEW YORK TIMES CO. ("N.Y.T."):**

165. Arthur O. Sulzberger (Chairman, N.Y.T., OC) 620 Eighth Avenue New York, NY 10018

Name	Address	City	State	Zip Code
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**New York Times Federal Credit Union ("N.Y.T.F.C.U."):**

166. Peter Schmohl (Chairman, N.Y.T.F.C.U., OC) 620 Eighth Avenue, Fl. 28 New York, NY 10018

Name	Address	City	State	Zip Code
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167. Belinda Chung (Member Services Manager) (OC, ND) (see above address)

Name	Address	City	State	Zip Code
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**WILHELMINA INTERNATIONAL, INC. ("Wilhelmina"):**

168. Mark Schwartz (Exec. Chairman, OC) 6 Perseverance Works 38 Kingsland Road, London E2 8DD

*New York offices:* 300 Park Avenue South New York NY 10010

Name	Address	City	State	Zip Code
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**Wilhelmina Kids & Creative Management, LLC ("Wilhelmina Mgmt."):**

169. Marta Michaud (Estreich) 249 1/2 East 13th Street New York NY 10003

Name	Address	City	State	Zip Code
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**ROCKEFELLER GROUP INTERNATIONAL, INC.**  
("RockGrp.," previously referenced as "40Rock"):

170. Daniel L. Rashin (C.E.O.) (OC, ND)

1271 Avenue of the Americas, Rockefeller Center New York NY 10020

Name	Address	City	State	Zip Code
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171. John Doe (21) (Security official) (see above address)

Name	Address	City	State	Zip Code
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**NEW YORK PUBLIC LIBRARY (N.Y.P.L.)**

172. BOARD OF TRUSTEES (address unknown)

Name	Address	City	State	Zip Code
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173. OMISHA COVINGTON-ISIDORE

Epiphany Branch 228 East 23rd Street New York NY 10010

Name	Address	City	State	Zip Code
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174. JOHN DOE (24) (Security Guard) (see above address)

Name	Address	City	State	Zip Code
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175. RIVERSIDE

Name	Address	City	State	Zip Code
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176. JOHN DOE (25) (Security Guard) (see above address)

Name	Address	City	State	Zip Code
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**CONCLUSION**

Respectfully submitted,

(Steven Talbert Williams, *Cestui Que* - Plaintiff)

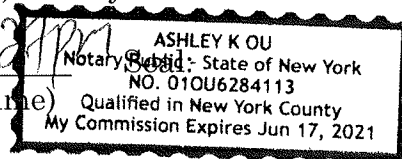
Date: December 19, 2018 Time: 4:26pm

Certified Notary Public:

I, , certified notary public for the County of New York,  
State of New York, due hereby certify this document presented before me and have  
documented Plaintiffs' identification, as such belongs to the party named above, on  
this day of 19th, in the month of December, of the year 2018.

(Signature)

(Time)



AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

## UNITED STATES DISTRICT COURT

for the

Southern District of New York



CESTUI QUE STEVEN TALBERT WILLIAMS

*Petitioner*

v.

UNITED STATES OF AMERICA, et al.

*Respondent**(name of warden or authorized person having custody of petitioner)*Case No. \_\_\_\_\_  
*(Supplied by Clerk of Court)*

## PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

## Personal Information

1. (a) Your full name: Steven Talbert Williams (Plaintiff Pro Se, acting as a beneficiary "Cestui Que")  
 (b) Other names you have used: Cestui Que Steven Talbert Williams
2. Place of confinement:  
 (a) Name of institution: Montgomery County Correctional Facility  
 (b) Address: 22880 Whelan Ln, Boyds, MD 20841  
 (c) Your identification number: MD v. Williams, Steven T., No. ID00283543 (Montg. Co. Dist.Ct)
3. Are you currently being held on orders by:  
☐ Federal authorities      ☐ State authorities      ☐ Other - explain:  
No
4. Are you currently:  
☐ A pretrial detainee (waiting for trial on criminal charges)  
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime  
 If you are currently serving a sentence, provide:  
 (a) Name and location of court that sentenced you: \_\_\_\_\_  
 (b) Docket number of criminal case: \_\_\_\_\_  
 (c) Date of sentencing: \_\_\_\_\_  
☐ Being held on an immigration charge  
☒ Other *(explain)*: This Matter is sought for a non-moot post-conviction/ post-release review of Plaintiffs' sentencing within the Montgomery County Correctional Facility ("MCCF"), issued by Montgomery County District Court.

**Decision or Action You Are Challenging**

5. What are you challenging in this petition:

- ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)
- ☐ Pretrial detention
- ☐ Immigration detention
- ☐ Detainer
- ☒ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- ☐ Disciplinary proceedings
- ☐ Other (*explain*): \_\_\_\_\_

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Montgomery County District Court (Rockville Court).

(b) Docket number, case number, or opinion number: No. ID00283543

(c) Decision or action you are challenging (*for disciplinary proceedings, specify the penalties imposed*):

A month long incarceration within Montgomery County Correctional Facility for "Theft Under \$100" (Md. Code §7-104(g) where Plaintiff claims he was abducted by a driver of a common commercial carrier (taxicab) and taken to an alternate location from where originally requested. Plaintiff filed a "grievance report" within MCCF.

(d) Date of the decision or action: Best knowledge: May 15, 2012. Yet, release judgment was June 18, 2012.

**Your Earlier Challenges of the Decision or Action**

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☒ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: Southern District Court of the State of New York

(2) Date of filing: June 30, 2015

(3) Docket number, case number, or opinion number: 15-cv-5114(LAP)(SDNY)

(4) Result: ORDER OF DISMISSAL, "for failure to state a claim. See 28 U.S.C. §1915(e), (2)(B)(ii)"

(5) Date of result: December 10, 2015

(6) Issues raised: Court stated "[v]enue... not [being] proper within this District[.]" wherein "the proper venue... would be the [U.S. Dist.Ct.] for the [S. Dist.] of Maryland. See 28 U.S.C. § 100(2)" See L.Civ.R. 81.1(1). See also US v. MORE, 3 Cranch 159(1805), "all the... mentioned courts... have power to issue writs of scire facias[ and] habeas corpus,... necessary for... jurisdictions[ and... usages of law." See

also An Act to Establish the Judiciary Courts of the United States, "[e]xtending [ ] jurisdiction... to cases in which the parties were residents of different states greatly enhanced the importance of the federal courts." See also *Winningham v. N. Amer. Resources Corp.*, 809 F.Supp 546 (261 F.P.D. 4th Ed. 185)

(b) If you answered "No," explain why you did not appeal: \_\_\_\_\_

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☒ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: United States Court of Appeals for the Second Circuit

(2) Date of filing: January 20, 2016

(3) Docket number, case number, or opinion number: 16-189cv(ALK)(DJ)(BDP)

(4) Result: ORDER OF DISMISSAL

(5) Date of result: October 18, 2016

(6) Issues raised: Court stated the case "lacks an arguable basis either in law or in fact,' Neitzke v. Williams, 490 U.S. 319, 325 (1989)"

(b) If you answered "No," explain why you did not file a second appeal: \_\_\_\_\_

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☒ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: United States Supreme Court

(2) Date of filing: March 15, 2017

(3) Docket number, case number, or opinion number: 16m111(U.S.S.Ct.)

(4) Result: Motion Denied.

(5) Date of result: April 17, 2017

(6) Issues raised: Court stated "Motion to direct the Clerk to file a petition for a writ of certiorari out of time filed." - Motion Reasoning: 2d Cir.App.Ct.'s dismissal was never received by mail to P.O.Box (renewed of payment prior to dismissal's mailing - as such was returned to the Court - Investigation is



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sought), as well as obtaining knowledge of the dismissal late & hardships of living on the street while, at the time, writing court documents only on a library's computer.

(b) If you answered "No," explain why you did not file a third appeal:

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☒ Yes ☐ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☒ Yes ☐ No

If "Yes," provide:

(1) Name of court: United States Supreme Court

(2) Case number: 16m111(U.S.S.Ct.)

(3) Date of filing: Mar 1 2017

(4) Result: Motion Denied.

(5) Date of result: Apr 17 2017

(6) Issues raised: "Motion to direct the Clerk to file a petition for a writ of certiorari out of time filed."

Plaintiff states, he had conveyed intentions to file a habeas petition within the Southern District Court of the State of New York, however, the Court allegedly did not provide him ample opportunity to address the issue.

Plaintiff filed the habeas petition stating he had filed a "grievance report" within MCCF and wished to have such substituted for a habeas petition under 28 U.S.C. § 2241.

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☒ No

If "Yes," provide:

(1) Name of court: \_\_\_\_\_

(2) Case number: \_\_\_\_\_

(3) Date of filing: \_\_\_\_\_

(4) Result: \_\_\_\_\_

(5) Date of result: \_\_\_\_\_

(6) Issues raised: \_\_\_\_\_

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- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: Upon the grounds of the sentencing judgment, claimed as executed under conspired fraudulent and discriminatory pretenses, where it is requested of the court to validate this habeas matter as a collateral jurisdiction claim under 28 U.S.C. §2241 (an acceptable substitute for a habeas corpus action) for which the filing of the grievance report was allegedly the only available exhausted remedy which led to the release judgment.

#### 11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

☐ Yes ☒ No

If "Yes," provide:

- (a) Date you were taken into immigration custody: \_\_\_\_\_
- (b) Date of the removal or reinstatement order: \_\_\_\_\_
- (c) Did you file an appeal with the Board of Immigration Appeals?  
☐ Yes ☒ No

If "Yes," provide:

- (1) Date of filing: \_\_\_\_\_
- (2) Case number: \_\_\_\_\_
- (3) Result: \_\_\_\_\_
- (4) Date of result: \_\_\_\_\_
- (5) Issues raised: \_\_\_\_\_

- (d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☒ No

If "Yes," provide:

- (1) Name of court: \_\_\_\_\_
- (2) Date of filing: \_\_\_\_\_
- (3) Case number: \_\_\_\_\_

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- (4) Result: \_\_\_\_\_
- (5) Date of result: \_\_\_\_\_
- (6) Issues raised: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☒ No

If "Yes," provide:

(a) Kind of petition, motion, or application: \_\_\_\_\_

(b) Name of the authority, agency, or court: \_\_\_\_\_

(c) Date of filing: \_\_\_\_\_

(d) Docket number, case number, or opinion number: \_\_\_\_\_

(e) Result: \_\_\_\_\_

(f) Date of result: \_\_\_\_\_

(g) Issues raised: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Grounds for Your Challenge in This Petition**

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

**GROUND ONE:** This petition was first brought to the attention of SDNY within Docket No. 15-cv-5114(LAP) as a habeas matter, stating a filed grievance report within the prison led to Plaintiffs' release. However, upon release, Plaintiff failed to immediately seek restitution for the claimed illegal imprisonment, as he was under the impression that the imprisonment would be removed from his criminal record, yet was not.

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(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

It was solely when receiving an appearance ticket from Metropolitan Transit Authority police that Plaintiff was allegedly informed of the imprisonment still remaining upon his criminal history report. He then attempted to remedy the claimed illegal imprisonment within 15-cv-5114(LAP) only to have the matter denied by the appellate court and the U.S. S.Ct., simply due to a late filing of the certiorari petition. In furtherance of justice, this petition is an additional attempt to seek a post-conviction remedy within an unbiased court, separate from retaliation within the Maryland court system. 28 U.S.C. §§1332(a)(4), 1653, 2242, 2255(e).

(b) Did you present Ground One in all appeals that were available to you?

☒ Yes

☐ No

**GROUND TWO:** The sentencing of the imprisonment was executed in an alleged unconstitutional manner, where such was during an after normal court hours video trial, in violation of U.S. Const. Am. 6.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes

☐ No

**GROUND THREE:** Plaintiff explained during the claimed unconstitutional video trial, he had been taken to a different location than where he asked the driver of the common commercial carrier (taxi) to take him (nearly a half hour away from his desired destination), as such information was discriminatorily ignored by the judge. Plaintiff was charged with theft and sentenced to a month long imprisonment. U.S. Const. 1, 4, 5, 8, 13 §3, 14 §1.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Plaintiff was charged with attempting to not pay for the taxi fare, an amount of nearly \$30 (Md. Code §7-104(g)).

(b) Did you present Ground Three in all appeals that were available to you?

☒ Yes

☐ No

**GROUND FOUR:** Plaintiff claims he was human trafficked to MCCF after being detained within Montgomery County Detention Center and, as claimed, was illegally placed within the correctional facility's Crisis Intake Unit (an area for inmates with severe mental disorders), where he allegedly had a co-signer stipulation claimed illegally attached to his bail bond.

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

Plaintiff claims, during his imprisonment within the Crisis Intake Unit, he allegedly experienced multiple cases of abuse by Correctional Officers (C.O.), as such is claimed to have led to an altercation with a C.O. who forcefully placed Plaintiff into solitary confinement, forcing him to submit to medical exams (where he denied a physicians request to take medication for schizophrenia), and further transferred to a different detainment area of MCCF where he remained in solitary confinement for an above-average time period (2 weeks), being told after filing the metioned grievance report he was lost within the prison's computer database system. Comparative to a sentencing of capital punishment, where any possibility of his death would have gone unrecorded.

(b) Did you present Ground Four in all appeals that were available to you?

☒ Yes

☐ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

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#### Request for Relief

15. State exactly what you want the court to do: Plaintiff would like to: (i) remove the sentence from his criminal record (obtaining and destroying all fingerprints or other identifying documents associated to the imprisonment); (ii) investigate all medical records associated to his stay within MCCF's Crisis Intake Unit; and (iii) audit all financial records of the personnel and the prison so as to confirm claims of conspired acts to fill prison cells for requirements of federal funding and to verify if any assets of Plaintiffs' beneficial securitized trust (IRA) were reinvested with the aid of prison funding.



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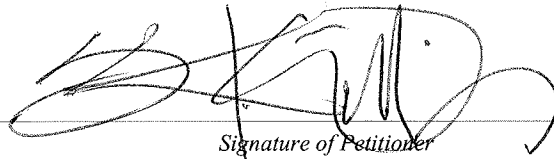
**Declaration Under Penalty Of Perjury**

If you are incarcerated, on what date did you place this petition in the prison mail system:

N/A

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: December 20, 2018



*Signature of Petitioner*

N/A

*Signature of Attorney or other authorized person, if any*